

Exhibit D

Joint Written Notice of Discovery Dispute

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8 Attorneys for Plaintiff
FEDERAL TRADE COMMISSION
9

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF ARIZONA

12 Federal Trade Commission,

13 Plaintiff,

14 v.

15 Grand Canyon Education, Inc., *et al.*,

16 Defendants.
17

No. CV-23-02711-PHX-DWL

**PLAINTIFF'S INITIAL
DISCLOSURES**

18 Plaintiff, the Federal Trade Commission ("FTC"), pursuant to Federal Rule of
19 Civil Procedure 26(a)(1), makes the following initial disclosures:

20 **I. The name and, if known, the address and telephone number of each individual**
21 **likely to have discoverable information – along with the subjects of that information**
22 **– that the FTC may use to support its claims or defenses, unless the use would be**
23 **solely for impeachment – Fed. R. Civ. P. 26(a)(1)(A)(i).**

24 A. The individual Defendant (Brian E. Mueller), current and former employees of the
25 corporate Defendants Grand Canyon Education, Inc. and Grand Canyon University,
26 and agents of the corporate Defendants, each of whom Defendants can more readily

1 identify than Plaintiff, have discoverable information regarding the plans for
2 formation of Gazelle University and their consequences, Defendants' telemarketing
3 practices and representations in the course of marketing, and the requirements of
4 doctoral programs and fees collected from students in those programs. These
5 individuals include the persons identified in Attachment A.

6 B. Corporate Defendants' third-party service providers, and their current and former
7 principals, officers, directors, managers, employees, agents, and representatives, each
8 of whom Defendants can more readily identify than the FTC, are likely to have
9 discoverable information that the FTC may use to support its claims in this action
10 regarding Defendants' marketing and telemarketing practices. These individuals
11 include the persons identified in Attachment B.

12 C. Consumers who have read, heard, or received representations that (a) GCU is a non-
13 profit institution; (b) GCU transitioned back to its prior manner of operation as a non-
14 profit educational institution; (c) GCU doctoral degree programs that include a
15 dissertation requirement are typically completed in twenty courses or 60 credits; and
16 (d) GCU's total charges for doctoral degree programs that include a dissertation
17 requirement are the tuition and fees for twenty courses, each of whom Defendants
18 can more readily identify than Plaintiff. These individuals include the persons
19 identified in Attachment C.

20 D. Consumers who have received telemarketing calls from corporate Defendants, their
21 agents, or third-party service providers after requesting that Grand Canyon
22 University (or others calling on its behalf) stop calling them or placing their numbers
23 on the National Do Not Call Registry, each of whom Defendants can more readily
24 identify than Plaintiff. Individuals who have reported discoverable information
25 arising from such telemarketing calls are identified in Attachment D.

26

E. FTC staff listed below, who received documents produced by corporate Defendants and third parties during the FTC's pre-complaint investigation, and are custodians of electronically stored information that the FTC may use to support its claims.

Defendants may contact the following staff only through FTC's counsel of record.

- Megan Baburek, Senior Data Analyst
- Kendra Freeman, CID response custodian
- Esi Kovacs, Discovery document custodian

II. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the FTC has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment – Fed. R. Civ. P. 26(a)(1)(A)(ii).

Plaintiff may use the following documents currently in its possession, custody or control, to support its claims, all of which are located in the FTC's offices located at 600 Pennsylvania Avenue, NW, and 400 7th Street SW, Washington, DC..

- Tolling Agreements with corporate Defendants Grand Canyon Education, Inc., and Grand Canyon University.
- Documents, testimony, statements, and verifications received from corporate Defendants and their designated representatives pursuant to the FTC's civil investigative demands.
- Consumer complaints and related documents submitted directly to the FTC, to the Department of Education, to a Better Business Bureau, or with a state or local law enforcement agency.
- Images of digital sites operated by corporate Defendants or third parties from which Defendants have acquired information about consumers.
- Documents from the dockets of other actions and proceedings involving Defendants:
 - o Carr et al v. Grand Canyon University, USDC AZ, Docket No. 2:19-05214

- 1 o Carr et al v. Grand Canyon University; Young v. Grand Canyon University,
2 USDC N Ga, Docket No. 1:19-01707
- 3 o Young v. Grand Canyon University, 11th Cir, Docket No. 21-12564
- 4 o Fellows v. Grand Canyon Education, Inc., USDC W Pa, Docket No. 1:18-00314
- 5 o Grand Canyon University v. Miguel Cardona, et al, 9th Cir, Docket No. 21-17113
- 6 o Grand Canyon University v. Rosenfelt et al., USDC AZ, Docket No. 2:21-00177
- 7 o In Re Grand Canyon Education, Inc. Securities Litigation, USDC DE, Docket No.
8 1:20-00639
- 9 o Ogdon v. Grand Canyon University, USDC AZ, Docket No. 2:22-00477.
- 10 o Smith v. Grand Canyon Education, Inc., USDC AZ, Docket No. 2:24-01410
- 11 o United States Of America ex rel. MacKillop v. Grand Canyon University, USDC
12 MA, Docket No. 1:18-11192
- 13 o United States Of America ex rel. MacKillop v. Grand Canyon University, USDC
14 AZ, Docket No. 2:23-00467
- 15 o Walsh v. Grand Canyon Education, Inc., USDC DE, Docket No. 1:20-00801
- 16 • Documents the FTC has obtained from the following entities through online queries,
17 information requests, or civil investigative demands:
 - 18 o Arizona Corporation Commission, 1200 W. Washington Street, Phoenix, AZ
19 85007
 - 20 o Alaska Department of Law, Commercial, Fair Business & Child Support Section,
21 1031 West 4th Avenue, Suite 200, Anchorage, Alaska 99501
 - 22 o All Star Directories, Inc., 101 Stewart Street, Suite 500, Seattle, WA 98101
 - 23 o Arizona State Board for Private Postsecondary Education, 1400 W. Washington
24 Street Phoenix AZ 85007
 - 25 o Arizona Secretary of State, Business Services Division, 1700 West Washington
26 St., Phoenix, AZ 85007

- 1 o CompliancePoint, Inc, 4400 River Green Parkway, Suite 100, Duluth, GA 30096
- 2 o Colorado Department of Law, Consumer Protection Section, Ralph L. Carr
- 3 Colorado Judicial Center, 1300 Broadway, 7th Floor, Denver, CO 80203
- 4 o Cygnus Marketing Communications, Inc., 1100 East Hector Ave, Suite 245,
- 5 Conshohocken, PA 19428
- 6 o EducationDynamics, LLC, 111 River Street, 10th Floor, Hoboken, NJ 07030
- 7 o The Higher Learning Commission, 230 South LaSalle Street, Suite 7-500,
- 8 Chicago, IL 60604-1411
- 9 o Internet Archive, 300 Funston Avenue, San Francisco, CA 94118
- 10 o Indiana Office of the Attorney General, Consumer Protection Division, 5th Floor,
- 11 Indiana Government Center South, 302 W Washington Street, Indianapolis, IN
- 12 46204
- 13 o North Carolina Secretary of State, Telephonic Sellers Registration, 2 S. Salisbury
- 14 Street, Raleigh, NC 27603
- 15 o Niche.com, 2840 Liberty Avenue, Pittsburgh, PA 15222
- 16 o Ohio Attorney General, Consumer Protection Unit, 30 E. Broad St. 14th Floor,
- 17 Columbus, OH 43215
- 18 o Oklahoma Attorney General, TRACR, 313 N.E. 21 St., Oklahoma City, OK
- 19 73105
- 20 o PossibleNow, Inc., 4400 River Green Parkway, #100, Duluth, GA 30096
- 21 o TriAd Media Solutions, Inc., 2 Hudson Place, 8th Floor, Hoboken, NJ 07030
- 22 o United States Department of Education, 400 Maryland Ave, SW, Washington,
- 23 DC 20202
- 24 o United States Department of the Treasury, Internal Revenue Service, 1111
- 25 Constitution Avenue NW., Washington, DC 20224
- 26

- o United States Securities and Exchange Commission, 100 F Street NE,
Washington, DC 20549
- o Washington State Department of Licensing, 6500 Linderson Way, SW #102,
Turnwater, WA 98501
- o West Virginia State Tax Department, Office of Business Registration, 1001 Lee
Street East, Charleston WV 25301 United States Securities and Exchange
Commission, 100 F Street NE, Washington, DC 20549

III. A computation of each category of damages claimed by the FTC – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered – Fed. R. Civ. P. 26(a)(1)(A)(iii)

Pursuant to Section 19(b) of the FTC Act, 15 U.S.C. §57b(b), the FTC will be seeking monetary relief to redress injury to consumers resulting from Defendants’ violations of the Telemarketing Sales Rule, including but not limited to refunds of monies paid, and redress for misleading representations and abusive telemarketing. Based on the information currently available, the FTC believes that such monetary relief will include:

A. the refund of fees paid by students enrolled in GCU’s College of Doctoral Studies, less any such payments that Defendants refunded to students. The FTC estimates Defendants collected approximately \$125 million from roughly 7,500 students enrolled in doctoral programs. Computation of this monetary relief will be principally based on information currently in Defendants’ possession, custody, or control, including, but not limited to: (1) consumer files; (2) financial records of doctoral student payments and refunds; and (3) information in GCU catalogs and enrollment agreements for GCU’s College of Doctoral Studies. The FTC estimate of consumer injury is presently based on

1 information produced by Defendant Grand Canyon Education, Inc. in response to
2 Interrogatory P of the FTC’s Civil Investigative Demand, and statements in Grand
3 Canyon University catalogs, applications, enrollment agreements and financial records
4 on the tuition and fees charged and collected for dissertation programs and continuation
5 courses. Moreover, documents produced by GCU as “Ledger Cards” in response to the
6 FTC’s Civil Investigative Demand, labelled GCU-FTC-013674 — GCU-FTC-013695
7 and GCU-FTC-019158 — GCU-FTC-019180, demonstrate that Defendants possess
8 information on payments made by doctoral students entitled to refunds. The amount of
9 refunds and consumers eligible for such refunds may be determined from the sources of
10 the information in such Ledger Cards.

11 B. redress for injuries from telemarketing calls by Grand Canyon Education,
12 Inc. to individuals who had requested that Grand Canyon University, its agents, or its
13 third-party service providers, stop calling them or had placed their numbers on the
14 National Do Not Call Registry, or both. The telephone call records identifying the
15 number of such calls, the duration of the calls, and the number of individuals who
16 received such calls are in the possession of Defendant Grand Canyon Education, Inc.,
17 and include data produced in response to the Commission’s Civil Investigative Demand
18 designated by Grand Canyon Education, Inc. as:

19 GCE-FTC-CID-017-00000621

20 GCE-FTC-CID-013-00000003

21 GCE-FTC-CID-018-00000006

22 GCE-FTC-CID-013-00000004

23 GCE-FTC-CID-013-00000001

24 GCE-FTC-CID-014-00000001

25 GCE-FTC-CID-018-00000005

26 GCE-FTC-CID-018-00000007

1 While the records of telemarketing calls provided by Grand Canyon Education,
2 Inc. are incomplete, and will be subject to discovery in this action, the FTC currently
3 estimates that, a result of telemarketing campaigns for Grand Canyon University since
4 May 2019, Defendants initiated more than 20 million telemarketing calls to telephone
5 numbers that were listed on do-not-call lists at the time the call was made, and these
6 calls were made to at least 1.8 million different telephone numbers. Records produced
7 by Defendants and lead providers that Defendants hired to secure written permission
8 from consumers authorizing telemarketing calls on behalf of Grand Canyon University
9 show that Defendant Grand Canyon Education, Inc. has been willing to pay \$30 to \$75
10 per consumer for permission to initiate such calls. Such illegal calls violate the
11 recipients' privacy and result in lost time and annoyance.

12 C. Defendants' liability includes pre-judgment interest on redress at the
13 interest rates applicable to financing tuition and fees with direct student loans for Grand
14 Canyon University graduate programs, or the statutory interest rate on judgments. *See*
15 *United States v. Gordon*, 393 F.3d 1044, 1058 n. 12 (9th Cir. 2004). Data tables with the
16 relevant rates are available from the United States Department of Education and the
17 Federal Reserve. *See* Fixed Interest Rates for Direct Unsubsidized Loans for Graduate
18 or Professional Borrowers, [https://studentaid.gov/understand-aid/types/loans/interest-](https://studentaid.gov/understand-aid/types/loans/interest-rates)
19 [rates](https://studentaid.gov/understand-aid/types/loans/interest-rates); Federal Reserve Board - H15 - Data Download Program,
20 <https://www.federalreserve.gov/datadownload/Choose.aspx?rel=H15>.

21 The FTC maintains, or will maintain, this information in electronic and paper
22 form in the FTC's offices at 600 Pennsylvania Avenue, NW, and 400 7th Street, SW,
23 Washington, DC.

1 **IV. Provide for inspection and copying as under Rule 34 any insurance agreement**
2 **under which an insurance business may be liable to satisfy all or part of a judgment**
3 **in the action or to indemnify or reimburse for payments made to satisfy the judgment**
4 **– Fed. R. Civ. P. 26(a)(1)(A)(iv)**

5 The FTC is not aware of any insurance agreement under which an insurance
6 business may be liable to satisfy all or part of a possible judgment in this action or to
7 indemnify or reimburse for payments made to satisfy a judgment.

8 September 17, 2024

Respectfully submitted,

9 FEDERAL TRADE COMMISSION

10
11 By: /s/
12 Michael E. Tankersley
13 Brian Berggren
14 Carlton B. Mosley
15 FEDERAL TRADE COMMISSION
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17 Washington, D.C. 20580
18 Telephone: (202) 326-2991
19 Email: mtankersley@ftc.gov

20 *Attorneys for Plaintiff*
21 *FEDERAL TRADE COMMISSION*
22
23
24
25
26

Attachment A

Full Name	Addresses	Telephone
Sally Eddy Bednar	203 Shore Rd, Old Greenwich, CT 06870-2419	212-214-6770
Patrick Shields	2323 Victory Ave., Suite 2000, Dallas, TX 75219; 101 E Washington St., Suite 910, Phoenix, AZ 85004	602-322-3133
Erin Albert	2600 W. Camelback Road, Phoenix, AZ 85017	
Sarah Boeder	2600 W. Camelback Road, Phoenix, AZ 85017	
Bart Burkert	2600 W. Camelback Road, Phoenix, AZ 85017	
Chanelle Ison	2600 W. Camelback Road, Phoenix, AZ 85017	
Peter Martinez	2600 W. Camelback Road, Phoenix, AZ 85017	
W. Stan Meyer	2600 W. Camelback Road, Phoenix, AZ 85017	
Brad Reifschneider	2600 W. Camelback Road, Phoenix, AZ 85017	
Chad Wilson	2600 W. Camelback Road, Phoenix, AZ 85017	
Nikki Mancuso	2600 W. Camelback Road, Phoenix, AZ 85017	
Christal Mosby (Hays)	2600 W. Camelback Road, Phoenix, AZ 85017	
Daniel Bachus	2600 W. Camelback Road, Phoenix, AZ 85017	
Kris Brandt	2600 W. Camelback Road, Phoenix, AZ 85017	
Julie Chaney	2600 W. Camelback Road, Phoenix, AZ 85017	
Justin DeLima	2600 W. Camelback Road, Phoenix, AZ 85017	
Tamara Rios	3300 W Camelback Rd, Phoenix, AZ, 85017	

Attachment A

Full Name	Addresses	Telephone
Victoria Hampel	2600 W. Camelback Road, Phoenix, AZ 85017	
Aaron Westover	2600 W. Camelback Road, Phoenix, AZ 85017	
Shawna Barnett	2600 W. Camelback Road, Phoenix, AZ 85017	
Shareen Christie	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4451
Felicia Roberts	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4322
Robert Van Cuyck	2600 W. Camelback Road, Phoenix, AZ 85017	602-247-3125
Shawn Harper	2600 W. Camelback Road, Phoenix, AZ 85017	
Kierstin Almstrum	2600 W. Camelback Road, Phoenix, AZ 85017	602-501-1122
Heidi Ashby	2600 W. Camelback Road, Phoenix, AZ 85017	602-639-4508
Michael Carter	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4362
Saeid Farr	2600 W. Camelback Road, Phoenix, AZ 85017	
Gary Flanagan	2600 W. Camelback Road, Phoenix, AZ 85017	
Karen Garcia	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4234
Erika Green	2600 W. Camelback Road, Phoenix, AZ 85017	602-639-9565
Rodney Grilliot	2600 W. Camelback Road, Phoenix, AZ 85017	
Steve Holmes	2600 W. Camelback Road, Phoenix, AZ 85017	602-501-6282/602- 513-4668
Lance Hyden	2600 W. Camelback Road, Phoenix, AZ 85017	

Attachment A

Full Name	Addresses	Telephone
Jacquelin Kaercher	4688 Tangerine Rd, Marana AZ 85658-4862	520-248-3709
Michaela Marshall	2600 W. Camelback Road, Phoenix, AZ 85017	602-639-5946
Craig Monson	2600 W. Camelback Road, Phoenix, AZ 85017	
Cristi Parker	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4324
Mike Peachey	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4153/602- 505-1142
Garhett Revetta	2600 W. Camelback Road, Phoenix, AZ 85017	
Anne Ruben	2600 W. Camelback Road, Phoenix, AZ 85017	602-639-5968
Spencer Schaeffer	2600 W. Camelback Road, Phoenix, AZ 85017	602-639-5964
Rachel Shively	2600 W. Camelback Road, Phoenix, AZ 85017	
Lindsay Skinner	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4224
Hayes Todd	2600 W. Camelback Road, Phoenix, AZ 85017	
Lance Tyler	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4179
Gillian Wheatt	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4178
Anne Wilburn	2600 W. Camelback Road, Phoenix, AZ 85017	602-639-5968/602- 505-1126
Rovita Williams	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4723
Julie Young	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4142
Tamieka Zambrano	2600 W. Camelback Road, Phoenix, AZ 85017	602-513-4136

Attachment A

Full Name	Addresses	Telephone
Brendan McInerney	2600 W. Camelback Road, Phoenix, AZ 85017	
Junette West	3300 W Camelback Rd, Phoenix, AZ, 85017	
Dilek Marsh	2600 W. Camelback Road, Phoenix, AZ 85017	
Don Andorfer	3300 W Camelback Rd, Phoenix, AZ, 85017	
Michael Berger	3300 W Camelback Rd, Phoenix, AZ, 85017	
Will Gonzalez	3300 W Camelback Rd, Phoenix, AZ, 85017	
Fred Miller	3300 W Camelback Rd, Phoenix, AZ, 85017	
Jim Rice	3300 W Camelback Rd, Phoenix, AZ, 85017	
Michelle Sandoval	3300 W Camelback Rd, Phoenix, AZ, 85017	
Teri Schobinger	2600 W. Camelback Road, Phoenix, AZ 85017	
Brian McGuire	3300 W Camelback Rd, Phoenix, AZ, 85017	
Kathleen Hall	3300 W Camelback Rd, Phoenix, AZ 85017	602-639-6658
Drew Watkins	Candid Maven, 3219 E Camelback Rd Ste 221, Phoenix, Arizona 85018	877-835-5785
Erin Kerger	2600 W. Camelback Road, Phoenix, AZ 85017	
Maddie Lindahl, Jr	2600 W. Camelback Road, Phoenix, AZ 85017	
Brian Roberts	Brian Michael Roberts PLLC, 3501 E. Rose Ln., Paradise Valley, AZ, 85253	

Attachment B

Full Name	Organization	Addresses	Telephone
Sarah Bouchelle	CompliancePoint, Inc	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1100; 678-287-7790
Matt Cagle	CompliancePoint, Inc	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1020
Laura Dobrzanski	Omniangle Technologies LLC	2400 N Commerce Pkwy, Weston, FL, 33326	954-343-1093
Jordan Eisner	CompliancePoint, Inc	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1020
Paul Gipson	CompliancePoint, Inc	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1020
Chris Hoover	CompliancePoint, Inc	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1020
Denis Pearson	PossibleNow, Inc.	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1020
Kathy Pelland	CompliancePoint, Inc	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1020
Greg Sparrow	CompliancePoint, Inc	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1020
Rick Stauffer	CompliancePoint, Inc	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1020
Vic Torrisi	PossibleNow, Inc.	440 River Green Parkway, Suite 100, Duluth, GA 30096	770-255-1020
Gus Aldana	ClassesUSA.com LMB Opco LIM Holdings	12181 Bluff Creek Dr Ste 250, Playa Vista, CA 90094	805-728-5446

Attachment B

Full Name	Organization	Addresses	Telephone
Kendra Angotti	Archer Education Campus Explorer	12555 West Jefferson Blvd. #202, Los Angeles, CA 90066	816-977-4063
Chelsia Bernhard	Cygnus Marketing Communications, Inc.	1100 E. Hector St. Ste 245, Conshohocken, PA 19428	865-804-3350
Michael Butler	TriAd Media Solutions, Inc.	187 Washington Ave Floor 2, Nutley, NJ 07110	201-499-7170
Devin Cassels	Cygnus Marketing Communications, Inc.	1100 E. Hector St. Ste 245, Conshohocken, PA 19428	865-804-3350
David Chartier	EducationDynamics, LLC	15200 Santa Fe Trail Dr., Suite 200, Lenexa, KS 66219	201-377-3068
Jessica Elam	Cygnus Marketing Communications, Inc.	1100 E. Hector St. Ste 245, Conshohocken, PA 19428	865-804-3350
Mark Eshelman	Niche.com	2840 Liberty Avenue, Suite 202, Pittsburgh, PA 15222	
Michael Flores	EducationDynamics, LLC	15200 Santa Fe Trail Dr., Suite 200, Lenexa, KS 66219	201-377-3068
Fred Frantz	Gragg Advertising	5200 Metcalf Ave. Ste 302, Overland Park, KS 66202	816-931-0050
Dave French	Full Beaker Nurse.org	200 112th Ave NE Ste 310, Bellevue, WA 98004	231-239-3045
Amy Gaglardi	Beelineweb.com.com	9611 Highway 97, Lake Country, BC V4V 1T7	250-766-2589
Jeff Gerber	Candid Maven Inc.	3219 E. Camelback Rd. Ste 221, Phoenix, AZ 85018	602-695-6299
Lala Gusakov	All Star Directories, Inc.	101 Stewart St. #500, Seattle, WA 98101	206-436-7500

Attachment B

Full Name	Organization	Addresses	Telephone
Alan Handford	Reach Network, Inc. Optimal	123 Lake Street S. Ste 100, Kirkland, WA 98033	425-605-8898
Lea Harbul	EducationDynamics, LLC	15200 Santa Fe Trail Dr., Suite 200, Lenexa, KS 66219	201-377-3068
Greg Hough	Niche.com	2840 Liberty Ave. Ste 202, Pittsburgh, PA 15222	
Bill Hummel	All Star Directories, Inc.	101 Stewart St, Seattle, WA 98101	206-436-7500
Zachary Jacobson	Better Spender LLC Better Nurse	5400 Carillon Point, BLDG 5000 FL 4, Kirkland, WA 98033	206-596-6619
Sung Kim	TriAd Media Solutions, Inc.	2 Hudson Place, 8th Floor, Hoboken, NJ 07030	201-499-7162
Shannon Kovac	QuinStreet, Inc.	950 Tower Ln Fl 6, Foster City, CA, 94404	(650) 587-7700
Andrea Lee	adHere, Inc., Inc.	111 N. Market St. Ste 300, San Jose, CA 95113	408-309-8779
Howard Mandel	Zeta Global Corp.	185 Madison Ave, 5th Floor, New York, NY 10016	212-967-5055
Landyn Milburn	Banner Edge Media	18835 N Thompson Peak Pkwy Ste 210, Scottsdale, AZ 85255	206-816-0367
Andrew Milner	Cygnus Marketing Communications, Inc.	1100 E. Hector St. Ste 245, Conshohocken, PA 19428	865-804-3350
Lindsay Monack	One on One Marketing, LLC	4800 140th Ave North Ste 101, Clearwater, FL 33762	781-690-0055
Dave Murphy	BirdDog Media	1232 W. Northwest Highway, Palatine, IL 60067	224-723-5698

Attachment B

Full Name	Organization	Addresses	Telephone
Marcelo Solari Parravicini	Cygnus Marketing Communications, Inc.	1100 East Hector Ave, Suite 245, Conshohocken, PA 19428	865-804-3350
Venessa Regali	EducationDynamics, LLC	15200 Santa Fe Trail Dr., Suite 200, Lenexa, KS 66219	201-377-3068
Paul Rippetoe	Study.com LLC	100 View St. #202, Mountain View, CA 94041	650-996-2123
Elise Romero	Archer Education Campus Explorer	12555 West Jefferson Blvd. #202, Los Angeles, CA 90066	816-438-2883
James Rutha	TriAd Media Solutions, Inc.	2 Hudson Place, 8th Floor, Hoboken, NJ 07030	201-499-7163
Renee Shultz	EducationDynamics, LLC	15200 Santa Fe Trail Dr., Suite 200, Lenexa, KS 66219	201-377-3068
Rebecca Simo	Avenue100 Digital Media Solutions, Inc.	4800 140th Ave North Ste 101, Clearwater, FL 33762	603-801-8228
Rachel Smith	Found Search Marketing	8475 Nightfall Lane, Suite 200, Fishers, IN 46037	317-721-2229
Arun Thomas	All Star Directories, Inc.	101 Stewart St, Seattle, WA 98101	206-436-7500
Amanda Tomchak	QuinStreet, Inc.	950 Tower Lane, 6th Floor, Foster City, CA 94404	650-578-7741
Ryan Toubia	EducationDynamics, LLC	15200 Santa Fe Trail Dr., Suite 200, Lenexa, KS 66219	201-377-3068
Andrew Walker	EducateMe Marketing, Inc. Ventrix Advertising	PO Box 4470, Stateline, NV 89449	480-570-2231
John Weaver	EducationDynamics, LLC	15200 Santa Fe Trail Dr., Suite 200, Lenexa, KS 66219	201-377-3068

Attachment B

Full Name	Organization	Addresses	Telephone
Daphne Williams	EducationDynamics, LLC	15200 Sante Fe Trail Dr. Ste 200, Lenexa, KS 66219	201-377-3068
Monisha Wimberly	Digital Media Solutions, Inc.	4800 140th Ave North Ste 101, Clearwater, FL 33762	786-985-0943

Attachment C

Full Name	Addresses	Telephone
Misty Arthur	16032 N 171st Ln; Surprise, AZ 85388	602-769-6935
Maritzela Barakat	P.O. Box 1051, Montebello, CA 90640	310-739-3881
Brian Boulger	115 East Kings Highway, Maple Shade, NJ 08052	856-577-2837
Logan Brade	3625 E Ray Rd, Apt. 2044, Phoenix, AZ 85044-7118	480-414-8214
Tonika Brockman	3030 Barrymore St., Unit 111, Raleigh, NC 27603	757-406-8664
Alison Burroughs	76 Avignon Dr., Newark, DE 19702	302-740-0972
Alejanddro Orozco Cejudo	7135 E Maplewood Pl, Englewood, CO 80111	303-593-2539
Crystal M Coopman	104 Willow Way, Archbold, Ohio 43502	419-438-6145
Brian Coughlin	142 Shady Meadow Cir; Cary, NC 27513	774-219-9096
Scoty Davis	88798 Highway 3 N; Saint Maries, ID 83861	442-400-9393
Tashonna Douglas	P.O. Box 24950, Tempe, AZ 85285	602-686-0727
Shannon Finley	1660 Morningside Ave, Pittsburgh, PA 15206	610-529-4180
Jessika Foreshee		805-217-1413
Micah N Freeman	154 Westhaven Dr, Apt 11E, Myrtle Beach, South Carolina 295793481	843-997-3450
Dylan S Hockett	1435 Hilltop Circle, Windsor, Colorado 80550	970-302-8538
Evan Hoke		717-880-6336
Khalilah (Peters) Jackson	112 Bellington Dr, McDonough, GA 30253	347-951-6377
Crystal Keeton	P.O. Box 1265, Poteau, OK 74953	918-839-1282
Kristen Levesque-Lee		603-831-4056
Acoreous Lewis	3111 San Jacinto Cir., Sanford, FL 32771-6116	305-833-0027

Attachment C

Full Name	Addresses	Telephone
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Stephan Price	960 Madrona Ave S, Salem, OR 97302	503-893-8939
Robin Shedrick	513 W Minton St; Phoenix, AZ 85041	210-709-2175
Zenja Stallworth	2791 McAfee Rd; Decatur, GA 30032	904-651-8027
Kevin Torrey	PO Box 4379, Camp Verde, AR 86322	602-472-6355
Kenosha L White	1991 N State Highway 360, Apt 347, Grand Prairie, Texas 75050-1465	337-344-1290
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Attachment D

Full Name	Addresses	Telephone
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Eugene Black	131 Alexander Dr, Anniston, AL 36201	256-454-4363
Isabella Cameron	111 Boyd Lane,Unit C, Honolulu, HI 96813	612-807-5580
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Patty Coombs	Mount Vernon, NY 10550	917-412-9661
Ken Curry	PO Box 51254, Indianapolis, IN 46251	317-484-8963
Denise Davis	17 Wiley Way, Toms River, NJ 8757	732-688-9715
Megan Davis	6633 147th St, Savage, MN 55378	952-686-8941
Jordan Devera	1785 Winterfield Dr, Apt 5, Aurora, IL 60504	224-688-5689
Brianna Dioso	9609 Glenshee Dr., Rowlett, TX 75089	214-908-6329
Sydney Dudley	560 D Ave, Apt 9, Grand Haven, MI 49417	269-209-3261
Fresnel Fanfan	2063 Essex Place, Valley Stream, NY 11580	602-513-4178
Elari Fitzgerald	11406 Snowcap LN SE, Rainier, WA 98576	602-513-4039
Matthew Giannola	8907 N Park Plaza Court #116, Milwaukee, WI 53223	262-945-1218
Charles Ace Gibson	825 Harris Ave., Austin, TX 79705	310-968-0969
Sarah Graves	Fayetteville, AR 72703	870-623-3217
Jennifer Hargrave	615 W Rollingwood St, Pinehurst, TX 77362-3517	713-828-7253
Mike Hennessey	1326 N Izard St, Forrest City, AR 72335	501-448-5414

Attachment D

Full Name	Addresses	Telephone
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Harrison Kepley	5013 McClelland Dr., Apt 106, Wilmington, NC 28405	813-683-2270
Breanna Lamke	222 Old Fayetteville Rd, A207, Carrboro, NC 27510	813-418-2410
Angela Le	4616 SW Vacuna St, Portland, OR 97219	503-347-0317
Brenda McFeters	39562 Kimberly Ct., Sandy, OR 97055	503-729-3884
Richard Mills	5134 Lake Sore Dr., Waco, TX 76710	512-988-7798
Aimee Minard	2302 Alysse Ct, Johnstown, CO 80534	303-579-6637
Samantha Mosher	3816 N 83rd Ave Apt. 1027, Phoenix, AZ 85033	518-573-8615
Stephen Nguyen	3204 Visions, Irvine, CA 92620	657-271-9373
Jason Nichols		801-927-7004
Ashley Nicklas	3109 Braden Rd, Camino, CA 95709	916-385-2599
Sonya Pasi	CA	619-600-2124
Andrew Perrong	1657 The Fairway #131, Jenkin Town, PA 19046	215-947-1920
Jana Perry	5735 Highway 126, Blountville, TN 37617	423-226-0554
Tylynn Puller	18515 Stephens Dr, Eastpointe, MI 48021	313-880-9049
Howard Reyes	4417 Falkinson, Corpus Christi, TX 78416	361-537-4640

Attachment D

Full Name	Addresses	Telephone
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Michelle Sanchez	607 West Matz Ave. Apt. B, Harlingen, TX 78550	956-778-1657
Wesley Slifer	1006 Alma Dr., Lawrence, KS 66049	913-529-9259
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Liam Thompson	2730 Chautauqua Avenue, Norman, OK 73072	602-247-2046
Elly Tucker	111 Reynard Dr., Harrisonburg, VA 22801	434-981-1951
Scott Weber	2001 Astridge Way, Granite Bay, CA 95746	309-251-6288
Raymond Wu	New Jersey	646-354-8888
Alyssa Young	74 Kellogg Dr, Room 748, Pomona, CA 91768	425-301-8110